## IN THE STATE COURT OF CHATHAM COUNTY STATE OF GEORGIA

HELEN WATSON and	)	
ROBERT WATSON, SR.	)	
	)	
Plaintiffs,	}	
	)	CIVIL ACTION FILE NO
v.	)	STCV20-01830
	)	
SAM'S CLUB EAST, and	)	
STORE MANAGER ON	)	
ON FEBRUARY 23, 2019 and JOHN	)	
DOE 1-99	)	

## **NOTICE OF FILING REMOVAL**

TO: Clerk, State Court of Chatham County, Georgia.

In compliance with 28 U.S.C. § 1446 (d), you are hereby notified of the filing of a Notice of Removal in this action with the United States District Court for the Southern District of Georgia, Savannah Division, a copy of which is attached hereto.

Respectfully submitted this 15<sup>th</sup> day of February, 2021.

## DREW, ECKL & FARNHAM, LLP

/s/ Leslie P. Becknell
Michael L. Miller
Georgia Bar No. 508011
Leslie P. Becknell
Georgia Bar No. 046320
Attorneys for Defendants

303 Peachtree Street NE, Ste 3500 Atlanta, Georgia 30308 (404) 885-1400 MMiller@deflaw.com LBecknell@deflaw.com /s/ Garret W. Meader

Garret W. Meader Georgia Bar No. 142402 Attorneys for Defendants

777 Gloucester Streets Suite 305 Brunswick, Georgia 31520 (912) 280-9662 gmeader@deflaw.com

## **CERTIFICATE OF SERVICE**

This is to certify that I have this day forwarded, via statutory electronic service, a true and correct copy of the foregoing *Notice of Filing Removal* to the following attorney, addressed as follows:

Dwight Feemster Deffy & Feemster, LLC 340 Eisenbhower Drive, Suite 800 Savannah, GA 31406

This 15<sup>th</sup> day of February, 2021

DREW, ECKL & FARNHAM, LLP

/s/ Leslie P. Becknell
Leslie P. Becknell
Georgia Bar No. 046320
Attorneys for Defendants

303 Peachtree Street NE, Ste 3500 Atlanta, Georgia 30308 (404) 885-1400 LBecknell@deflaw.com